

JEFFREY COVINGTON  
COVINGTON vs CSAA

February 21, 2020

1

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

TAMMY COVINGTON and  
JEFFREY COVINGTON,

Plaintiffs

v.

Case No. 19-cv-00718-PRW

CSAA FIRE AND CASUALTY  
INSURANCE d/b/a AAA FIRE  
AND CASUALTY INSURANCE  
COMPANY, INC.

Defendants

DEPOSITION OF JEFFREY COVINGTON  
TAKEN ON BEHALF OF THE DEFENDANT  
IN OKLAHOMA CITY, OKLAHOMA  
ON FEBRUARY 21, 2020

9:04 a.m.

REPORTED BY: WENDY SMITH, CSR

JEFFREY COVINGTON  
COVINGTON vs CSAA

February 21, 2020  
116

1 the HVAC unit or water that you could see in the cracks  
2 off of the flooring that surrounded the wall of the HVAC  
3 closet?

4 A. No.

5 Q. So really, according to you, it was a onetime  
6 event where you saw this water on the floor, correct?

7 A. Yes.

8 Q. How often do you change the filters on the HVAC  
9 unit?

10 A. Every three months.

11 Q. Okay. So do you remember prior to August 8,  
12 2017, when you had last replaced the air filters?

13 A. I don't recall.

14 Q. Okay. Do you remember the first time you  
15 replaced the air filters after August 8th, 2017?

16 A. Are you asking me if there was water on the  
17 floor? I mean, I know I changed the filters.

18 Q. Right.

19 A. But I did not notice water either time. I know  
20 I would have done it, and I look at the floor. I look  
21 at the condition of the floor. I want to make sure  
22 there's nothing weird going on, any mold or whatever,  
23 you know, not that I expect it to be, but I just want to  
24 make sure that area's clean because we're breathing  
25 that, and it's very -- should be the cleanest place in